

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PUBLIC EMPLOYEES' RETIREMENT
ASSOCIATION OF COLORADO, TENNESSEE
CONSOLIDATED RETIREMENT SYSTEM,
SJUNDE AP-FONDEN, FJÄRDE AP-FONDEN, and
PENSIONSKASSERNES ADMINISTRATION A/S,
Individually and On Behalf of All Others Similarly
Situated,

Plaintiffs,
v.

CITIGROUP INC., CHARLES O. PRINCE, SALLIE L.
KRAWCHECK, GARY L. CRITTENDEN, TODD S.
THOMSON, ROBERT DRUSKIN, THOMAS G.
MAHERAS, MICHAEL STUART KLEIN, DAVID C.
BUSHNELL, JOHN C. GERSPACH, STEPHEN R.
VOLK, GEORGE DAVID and KPMG LLP,

Defendants.

TILLIE SALTZMAN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,
vs.

CITIGROUP INC., CHARLES O. PRINCE, ROBERT
E. RUBIN, STEPHEN R. VOLK, SALLIE L.
KRAWCHECK, GARY L. CRITTENDEN and
ROBERT DRUSKIN,

Defendants.

LENNARD HAMMERSCHLAG, Individually, and On
Behalf of All Others Similarly Situated,

Plaintiff
v.

CITIGROUP INC., CHARLES PRINCE, SALLIE
KRAWCHECK, and GARY CRITTENDEN,

Defendants.

No.

Electronically Filed

No. 1:07-cv-9901(SHS)

ECF CASE

Electronically Filed

No. 1:07-cv-10258(SHS)

ECF CASE

**THE GLOBAL PENSION FUNDS' NOTICE OF MOTION AND MOTION FOR AN
ORDER PARTIALLY LIFTING THE PRIVATE SECURITIES
LITIGATION REFORM ACT DISCOVERY STAY**

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Consolidated Retirement System, Sjunde AP-
Fonden, Fjärde AP-Fonden, and Pensionskassernes
Administration A/S

TO: All counsel of record

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, before the Honorable Sidney H. Stein, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 23A, New York, New York 10007-1312, upon the accompanying Declaration of Andrew J. Entwistle, dated January 7, 2008 and the exhibits thereto; the accompanying Memorandum of Law; and all other papers and proceedings herein, Public Employees' Retirement Association of Colorado, Tennessee Consolidated Retirement System, Sjunde AP-

Fonden, Fjärde AP-Fonden, and Pensionskassernes Administration A/S (collectively, the “Global Pension Funds”) will move this Court for an Order partially lifting the stay of discovery under the Private Securities Reform Act of 1995 (“PSLRA”), as set forth in Section 21D(b)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(b)(3)(B), to permit the Global Pension Funds to conduct limited document discovery and obtain the following documents and electronically stored information (“ESI”): all documents and ESI that Citigroup Inc. (together with its predecessors, subsidiaries, affiliates, and related entities “Citigroup”) and all other defendants in this action -- or any related actions that have been or will be filed (the “Actions”) -- have produced, or will be producing, to the United States Securities and Exchange Commission, any United States Attorney, any State’s Attorney General, the Financial Industry Regulatory Authority, Inc., and any other regulatory, governmental, or investigative agency, or other private parties involved in reviewing the facts and circumstances giving rise to the Actions.

REQUEST FOR ORAL ARGUMENT

The Global Pension Funds respectfully request oral argument if this Motion is opposed.

Dated: January 7, 2008

Respectfully,

ENTWISTLE & CAPPUCCI LLP

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